

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**DECLARATION OF CHRIS HARVEY**

Pursuant to 28 U.S.C. § 1746, I, CHRIS HARVEY, make the following declaration:

1.

My name is Chris Harvey. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2.

I currently am the Director of Elections for the State of Georgia. I have held that position since July 2015. From August 2007 to July 2015, I was the Chief Investigator and Deputy Inspector General for the Secretary of State's office, investigating, among other things, potential violations of state election law. For

more than a decade, I have acquired firsthand knowledge of Georgia's election processes at both the state and county level.

3.

Election officials across the state are working diligently to implement many significant updates to the election system that have been underway since last year, including implementing the new Dominion BMD system pursuant to the July 29, 2019 contract entered by the Secretary of State.

4.

As of November 12, 2019, Georgia has accepted (meaning that the devices have passed acceptance testing) 13,386 touchscreen devices, 5,855 printers, 1,921 polling place scanners, 202 ballot boxes, and 1,616 poll pads. All remaining election management systems will arrive next week.

5.

Every county currently has a demonstration BMD system in place.

6.

Training for county election officials regarding the use of BMD systems is active and ongoing. Training includes technical training on the new election management system, poll pads, ballot marking devices, printers, and scanners.

7.

The Georgia BMD system is an entirely new and separate voting system from the GEMS/DRE system. Contrary to allegations of Plaintiffs, the ballot boxes that hold the human-readable paper ballots produced by the BMDs do not store voted paper ballots in a manner that would compromise the anonymity of the voter. The paper ballots do not stack in the ballot box container in the order in which the ballots are cast, but scatter within the box as they come through the scanner, making the precise order in which they were cast unknowable.

8.

Georgia is engaged in a multi-faceted voter education and voter outreach campaign, which will continue through next year.

9.

BMDs have already been demonstrated to the public in Gwinnett county, Houston and Peach counties at the Georgia National Fair, Columbia county at the Columbia County Fair, Catoosa County, Jones County, and Bibb County in conjunction with the local state representatives. The system has also been demonstrated to the NAACP state convention, the Association County Commissioners of Georgia at their annual meeting, the Georgia Vision Alliance, among other demonstrations.

10.

Georgia has partnered with Verified Voting and VotingWorks to assist Bartow County in conducting a risk-limiting audit of City of Cartersville election that was conducted using BMDs and develop best practices for future tabulation audits in Georgia.

11.

The pilot audit in Bartow County will be used to assist the Secretary of State's office plans to prepare rules for statewide audits of BMDs once these audit pilot programs are complete and other methods of auditing are evaluated.

12.

Implementing the new BMD system already cost a great deal of time, effort, and expense. Total outlays to date are \$45,018,302.68 for equipment, including upfront costs of equipment.

13.

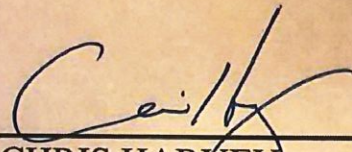
Dominion optical scanners will be used to count all ballots in Georgia elections beginning with the March 2020 Presidential Preference Primary. Ballots cast at precincts and in-person early voting will be counted on precinct scanners.

Absentee ballots and provisional ballots will be counted on high-capacity scanners in central election offices.

14.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13 day of November, 2019.

  
CHRIS HARVEY